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12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA

14 Gladys Perez,

15 Petitioner,

16 v.

17 Dwight Neven, Warden, Florence McClure
18 Correctional Institution and James
19 Dzurenda, Director, Nevada Department
20 of Corrections,

21 Respondents.

Case No. 2:14-cv-02087-APG-BNW

**Unopposed Motion to Extend Time
to file Supplemental Opposition to
Motion to Dismiss**

(First Request)

ORDER

POINTS AND AUTHORITIES

Petitioner Gladys Perez respectfully asks this Court to enter an Order extending her deadline for filing a Supplemental Opposition to the warden's motion to dismiss by 45 days to June 22, 2020.

This is Perez's first request for an extension of this deadline. Senior Deputy Attorney General Jessica Perlick does not object to this request.

Following the February 28, 2020 hearing on Perez's motion to show case, the parties entered into a stipulation that included a briefing schedule.¹ The transcript of the hearing was filed on April 7, 2020, and discovery was closed on April 6, 2020.²

Immediately following the hearing, the parties discussed the possibility of a partial resolution and agreed to discuss the matter in the near future, after opposing counsel, who was new to the case, had a chance to get up to speed. But then COVID-19 happened, and the parties were not able to speak substantively until March 20, 2020. Although the parties had a productive conversation, an agreement could not be reached.

Counsel is cognizant of this case's unique procedural posture and this Court's prior Orders regarding extensions. However, counsel was not able to complete her Supplemental Opposition. Counsel has been working remotely since March 18, 2020. And although counsel is working full time, she has additional duties and responsibilities related to managing staff of the Non-Capital Habeas Unit remotely. In addition, working remotely has brought its own technological challenges that we are solving as they arise, but which causes tasks to take longer than usual.

¹ ECF No. 141.

² ECF Nos. 141, 143.

1 Counsel anticipates additional duties and responsibilities as the FPD slowly
2 transitions back to work in the office as the Governor reopens Nevada. Counsel's
3 requested extension takes that into account her time on managerial duties so that
4 she does not have to return to this Court for an additional extension. Baring an
5 extraordinary, unforeseen circumstance, counsel intends to meet this deadline.
6 Accordingly, Perez respectfully asks this Court to extend the time for her to file her
7 Supplemental Opposition by 45 days to June 22, 2020.

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9 Dated May 6, 2020.

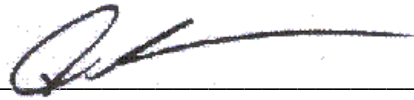
10 Respectfully submitted,

11
12 Rene L. Valladares
13 Federal Public Defender

14 /s/ Amelia L. Bizzaro

15 Amelia L. Bizzaro
16 Assistant Federal Public Defender

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18
19 **IT IS SO ORDERED.**

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22 _____
23 UNITED STATES DISTRICT JUDGE
24 Dated: May 6, 2020.